



Federal Regulatory Affairs
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August 20, 2013

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *Connect America Fund*, WC Dkt. No. 10-90

Dear Ms. Dortch:

On May 22, 2013, the Federal Communications Commission made a second round of Connect America Fund ("CAF") Phase I incremental funding available to price cap carriers.¹ In doing so, the Commission modified some elements from the first round of funding. It "adopt[ed] a process to challenge the eligibility of particular census blocks, [and] establish[ed] two different per-location support amounts based on the existing level of Internet access (\$550 for homes with low-speed Internet access and \$775, as in the first round, for homes with only dial-up access)."²

Through this filing Frontier submits its conditional application for \$71,852,575 of CAF Phase I second-round funding. With this funding, Frontier will deploy broadband speed internet access to 118,984 locations that previously lacked such service. Of these locations, 28,495 presently have dial-up only access (funded at \$775/location) and 90,489 have only low-speed Internet access (funded at \$550/location). Frontier's acceptance is conditional based upon the results of the challenge process, both for the census blocks in which Frontier is challenging the National Broadband Map's census block determination, as well as those census blocks that may be challenged by other parties.³ Frontier will provide further information on how the funding should be distributed by the Fund Administrator upon the FCC's final determination of the eligible census blocks within Frontier's submission today.

Frontier submits today four .csv files for the Commission's review, each identifying the GeoID Census block code, Operating Company number ("OCN"), Study Area Code ("SAC") and Wire Center CLLI Code for each census block for which Frontier plans to deploy broadband under this

¹ See *in re: Connect America Fund*, W.C. Dkt. No. 10-90, *Report and Order*, 28 FCC Rcd. 7766 (rel. May 22, 2013) ("May 2013 CAF Order").

² *Id.* at ¶ 2.

³ See 47 C.F.R. § 54.312(c)(7) (describing the challenge process). See also *May 2013 CAF Order* at ¶¶ 28-33. The locations and information for Frontier's challenges are based on the June 2012 National Broadband Map data set, as directed in the *May 2013 CAF Order*. See *id.* at ¶ 23.

second round of CAF Phase I. Each .csv file represents a different category on the National Broadband Map (“NBM”) as explained in the table below, with different associated funding categories.

File Name	File Contents	Expected Total Locations	Total Anticipated Funding
8-20-13 FTR Less Than 768 CBs.csv	Census blocks represented on NBM at less than 768 kbps download/200 kbps upload (\$775/location in funding)	28,495	\$22,083,625
8-20-13 FTR Less Than 3 Mb CBs.csv	Census blocks represented on NBM at greater than 768 kbps download/200 kbps upload and less than 3 Mbps download/768 kbps upload (\$550/location in funding)	36,699	\$20,184,450
8-20-13 FTR FTR Only CBs.csv	Census blocks represented on NBM as served by Frontier only, where the actual speeds delivered are less than 3 Mbps download/768 kbps upload and the relevant DSLAMs are copper-fed (\$550/location in funding)	42,104	\$23,157,200
8-20-13 FTR Challenge CBs.csv	Census blocks where Frontier is challenging the NBM’s inclusion of an unsubsidized competitor (\$550/location in funding)	11,687	\$6,427,300
TOTALS		118,984	\$71,852,575

For the 11,686 locations in which Frontier is challenging the National Broadband Map’s depiction of a census block’s service level, Frontier has attached document evidence in support of its assertion that the area is not actually served as represented on the NBM. In total, Frontier has prepared separate challenge documents, with each covering multiple census blocks. Those challenged census blocks are clearly identified in each file.

Pursuant to 47 C.F.R. § 54.312(c) the undersigned certifies that:

- (1) The locations to be served to satisfy the deployment obligation are not shown as served by fixed broadband at the speeds specified in 47 C.F.R. § 54.312(c)(2) or (c)(3) by any entity other than Frontier or an affiliate of Frontier’s on the National Broadband Map (June 2012 data set) except those for which Frontier is challenging the National Broadband Map’s census block designation pursuant to § 54.312(c)(7);
- (2) To the best of Frontier’s knowledge the locations are, in fact, unserved by fixed internet access with speeds of at least 3 Mbps downstream and 768 kbps upstream, or 768 kbps downstream and 200 kbps upstream, as appropriate;
- (3) Frontier’s current capital improvement plan does not already include plans to complete broadband deployment within the next three years to the locations to be counted to satisfy the deployment obligation;

- (4) Incremental support will not be used to satisfy any merger commitment or similar regulatory obligation;
- (5) Frontier has undertaken due diligence to determine the locations in question are not within the service area of either Broadband Initiatives Program or the Broadband Technology Opportunities Program projects that will provide internet access with speeds of at least 3 Mbps downstream and 768 kbps upstream;
- (6) Frontier has prioritized its projects so as to maximize the deployment of broadband-capable infrastructure to locations lacking Internet access with speeds of 768kbps downstream and 200 kbps upstream. Frontier has explored deployment to all locations lacking 768 kbps downstream and 200 kbps locations for which it is economically reasonable before addressing those lacking speeds of 3 Mbps downstream and 768 kbps upstream;
- (7) Pursuant to §54.312(c)(9), Frontier certifies that for locations identified as served by "Frontier only," no entity other than Frontier or its affiliate provides fixed internet service with speeds of 3 Mbps downstream and 768 kbps upstream as shown on the relevant version of the National Broadband Map. In these locations, Frontier certifies that the locations are not actually receiving speeds of 3 Mbps upstream and 768 kbps downstream and the locations are served through copper-fed digital subscriber line access multiplexers.
- (8) Frontier certifies that it will complete broadband deployment to two-thirds of the locations for which it receives funding within two years of the acceptance notification and complete broadband deployment to all locations within three years.

We look forward to working with the Commission throughout this process in order to maximize this opportunity to expediently deploy broadband in rural America.

Please feel free to contact me with any further questions.

Sincerely,

/s/ 

Michael Golob
Senior Vice President, Engineering and Technology
Frontier Communications
Michael.Golob@ftr.com

Attachments

cc: Ryan Yates
Amy Bender